

**LTL ATTORNEYS LLP**

Enoch H. Liang (SBN 212324)  
601 Gateway Boulevard, Suite 1010  
South San Francisco, California 94080  
Tel: 650-422-2130  
Fax: 213-612-3773  
enoch.liang@ltmlattorneys.com

James M. Lee (SBN 192301)  
Caleb H. Liang (Bar No. 261920)  
300 S. Grand Ave., 14th Floor  
Los Angeles, California 90071  
Tel: 213-612-8900  
Fax: 213-612-3773  
james.lee@ltmlattorneys.com  
caleb.liang@ltmlattorneys.com

**HUNG G. TA, ESQ. PLLC**

Hung G. Ta  
JooYun Kim  
250 Park Avenue, 7th Floor  
New York, New York 10177  
Tel: 646-453-7288  
hta@hgtlaw.com  
jooyun@hgtlaw.com

*Lead Counsel for Court-Appointed Lead Plaintiff and the Class*

*[Additional Counsel Listed on Signature Page]*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE TEZOS SECURITIES LITIGATION

This document relates to:

ALL ACTIONS.

Master File No. 17-cv-06779-RS

**CLASS ACTION**

**STIPULATION AND [PROPOSED]  
ORDER TO ADD NEW PLAINTIFF AND  
WITHDRAW FIRST AMENDED  
COMPLAINT**

Judge: Hon. Richard Seeborg

WHEREAS, Lead Plaintiff Arman Anvari filed a Consolidated Complaint (“Complaint”) (Dkt. No. 108) against Dynamic Ledger Solutions, Inc. (“DLS”), Tezos Stiftung, (“Tezos Foundation”), Kathleen Breitman, Arthur Breitman, Timothy Cook Draper (“Draper”), Draper Associates V Crypto LLC (“Draper Associates Crypto”) and Bitcoin Suisse AG (“Bitcoin Suisse”);

WHEREAS, on August 7, 2018, and August 31, 2018 the Court issued orders (Dkt. Nos. 148 and 163) granting the motions to dismiss the Complaint filed by Draper, Draper Associates Crypto and Bitcoin Suisse (collectively, the “Dismissed Defendants”), and dismissing the Dismissed Defendants from this action with prejudice;

WHEREAS, on September 14, 2018, DLS, the Tezos Foundation, Kathleen Breitman and Arthur Breitman (collectively, “Defendants”) filed their answers (Dkt. Nos. 168-171) to the Complaint;

WHEREAS, Lead Plaintiff seeks to add a plaintiff, Pumaro LLC, to the action;

WHEREAS, on November 12, 2018 Lead Plaintiff filed an Amended Consolidated Complaint (Dkt. No. 180) adding Pumaro LLC as a plaintiff;

WHEREAS, on or around November 12, 2018, the Dismissed Defendants objected to being included as named parties in the Amended Consolidated Complaint;

WHEREAS, Lead Plaintiff and Defendants have agreed that Pumaro LLC may be added to the Complaint without the need to file an amended pleading and, therefore, amended answers by Defendants;

IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of Lead Plaintiff and Defendants that:

(a) The Amended Consolidated Complaint is withdrawn and should be stricken from the Court’s docket in the above-captioned matter;

(b) The Complaint is amended to add plaintiff Pumaro LLC and the following allegation as paragraph 14a:

Plaintiff Pumaro LLC (“Pumaro”) is a Texas limited liability company which invested 1.9 Bitcoin in the Tezos ICO on July 1, 2017. Pumaro was promised delivery of 11,400 Tezos tokens upon the conclusion of the Tezos ICO and the launch of the Tezos network.

(c) Defendants, and each of them, answer paragraph 14a as follows :

Defendants are without sufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 14a pertaining to the residency of Pumaro and its alleged contribution to the Fundraiser, and on that basis deny them. Except as expressly admitted, Defendants deny each and every remaining allegation of paragraph 14a.

Stipulated and agreed to by:

Date: November 20, 2018

Respectfully Submitted,

LTL ATTORNEYS LLP

DAVIS POLK & WARDWELL LLP

By: s/ Enoch H. Liang  
 Enoch H. Liang  
 LTL ATTORNEYS LLP  
 601 Gateway Boulevard, Suite 1010  
 South San Francisco, California 94080  
 Tel: 650-422-2130  
 Fax: 213-612-3773  
 enoch.liang@ltlatorneys.com

By: /s/ Neal A. Potischman  
 Neal A. Potischman  
 Serge A. Voronov  
 1600 El Camino Real  
 Menlo Park, California 94025  
 Tel: (650) 752-2000  
 Fax: (650) 752-2111  
 neal.potischman@davispolk.com  
 serge.voronov@davispolk.com

James M. Lee  
 Caleb H. Liang  
 LTL ATTORNEYS LLP  
 300 S. Grand Ave., 14<sup>th</sup> Floor  
 Los Angeles, California 90071  
 Tel: 213-612-8900  
 Fax: 213-612-3773  
 james.lee@ltlatorneys.com  
 caleb.liang@ltlatorneys.com

Edmund Polubinski, III (*pro hac vice*)  
 Andrew S. Gehring (*pro hac vice*)  
 DAVIS POLK & WARDWELL LLP  
 450 Lexington Avenue  
 New York, New York 10017  
 Tel: (212) 450-4000  
 Fax: (212) 701-5800  
 edmund.polubinski@davispolk.com  
 andrew.gehring@davispolk.com

Hung G. Ta  
 JooYun Kim  
 HUNG G. TA, ESQ., PLLC  
 250 Park Avenue, 7th Floor  
 New York, New York 10177  
 Tel: 646-453-7288  
 Fax: 646-453-7289  
 hta@hgtlaw.com  
 jooyun@hgtlaw.com

*Counsel for Defendant Tezos Stiftung*

*Lead Counsel for Court-Appointed Lead  
 Plaintiff and the Class*

1 William R. Restis  
2 THE RESTIS LAW FIRM, P.C.  
3 402 West Broadway, Suite 1520  
4 San Diego, California 92101  
Tel: 619.270.8383  
william@restislaw.com

5 Joseph J. DePalma  
6 Bruce D. Greenberg  
7 LITE DEPALMA GREENBERG,  
8 LLC  
9 570 Broad Street, Suite 1201  
10 Newark, NJ 07102  
Tel: (973) 623-3000  
Fax: (973) 623-0858  
Jdepalma@litedepalma.com  
bgreenberg@litedepalma.com

11 *Additional Counsel for the Class*

12 BAKER MARQUART LLP

COOLEY LLP

13  
14 By: /s/ Brian E. Klein  
15 Brian E. Klein  
16 Scott M. Malzahn  
17 777 S. Figueroa, Suite 2850  
18 Los Angeles, CA 90017  
Tel: (424) 652-7814  
Fax: (424) 652-7850  
bklein@bakermarquart.com  
smalzahn@bakermarquart.com

By: /s/ Patrick E. Gibbs  
Patrick E. Gibbs  
Jessica Valenzuela Santamaria  
3175 Hanover Street  
Palo Alto, CA 94304-1130  
Tel: (650) 843-5000  
Fax: (650) 849-7400  
pgibbs@cooley.com  
jvs@cooley.com

19 *Attorneys for Defendants Dynamic Ledger*  
20 *Solutions, Inc., Kathleen Breitman, and*  
21 *Arthur Breitman*

*Attorneys for Defendant Dynamic Ledger*  
*Solutions, Inc.*

1 IT IS SO ORDERED. The Clerk of the Court is instructed to strike from the Court's files  
2 Docket Entry Number 180.

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4 Dated: November \_\_\_\_, 2018

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The Hon. Richard Seeborg  
United States District Judge  
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